



City of Seattle

Gregory J. Nickels, Mayor
Department of Planning and Development
D. M. Sugimura, Director

**CITY OF SEATTLE
ANALYSIS AND DECISION OF THE DIRECTOR OF
THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

Application Number: 2400532
Applicant Name: Tom Donnelly for Highline - West Seattle Mental Health Center
Address of Proposal: 2600 Southwest Holden Street

SUMMARY OF PROPOSED ACTION

Master Use Permit for future expansion of an existing institution (Highline West Seattle Mental Health Center). Project includes construction of two structures containing a total of six outpatient housing units, three units per building, and a 613 square foot commons building. Surface parking 249 vehicles will be provided at the development site.

The following approval is required:

SEPA – Environmental Determination- Chapter 23.05 Seattle Municipal Code

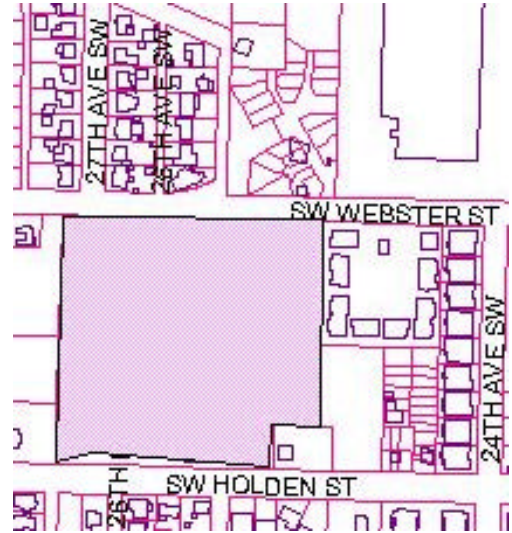
SEPA DETERMINATION: ☐ Exempt ☒ DNS ☐ MDNS ☐ EIS
☐ DNS with conditions
☐ DNS involving non-exempt grading or demolition or involving another agency with jurisdiction

BACKGROUND DATA

Site & Area Description

The subject site is located at mid-block along the north side of Southwest Holden Street, between 28th Avenue Southwest to the west and 24th Avenue Southwest to the east. The site is considered a through lot because it fronts upon two parallel streets, SW Holden Street to the south and SW Webster Street along the north property boundary line, in the West Hill neighborhood of West Seattle. The existing site encompasses a land area of approximately 397,976 square feet, located in a Commercial One zone with height limits of 30, 40, and 65 feet (C1-30, C1-40, and C1-65). The site is nearly square in shape, with a square notch cut out at the property's southeast corner. The subject site is has a modest downward slope from west to east, that is nearly flat around the

central campus area where a cluster of buildings are located. The visible impacts of the large site are not relatively apparent from neighboring properties because of on-site topographic conditions and vegetation. Mature trees and shrubs provide a green buffer along the site's perimeter. Surface parking for 249 vehicles are spread out over nine parking lots at the development site. Vehicle access to the site is taken from four driveways serving the primary arterial SW Holden Street. A secondary access serving one driveway can be found along the partially improved SW Webster Street; which dead ends just beyond the mid-point of the subject site. Southwest Holden Street is fully improved with sidewalk, gutters, etc.



In 1989 – 1990, the development site containing West Seattle Community Hospital was granted a Property Use and Development Agreement (PUDA) to remove the designation of major institution and rezone its campus to C1 zone with structure height limits which vary by location on the site. The lowest height limit of 30 feet rings the site's perimeter to provide a bulk and scale buffer for the surrounding properties. The development site is nestled in an expansive residential area. Zoning in the surrounding area includes residential Multifamily and Single family zones. To the north across SW Webster Street, to the west abutting the development site, and south across SW Holden Street, Single Family 5000 stretches forth a great distance. The housing stock in the immediate area is a mix of post World War II, one and two-story homes. Abutting the site to the east is a swatch of Multifamily Lowrise Two (L2), with a minimum density limit of one unit per 1,200 square feet of lot area. Apartments and town homes are clustered around the SW Holden Street from the development site and Delridge Way SW to the east. The development site is located on the east side of a hill overlooking Delridge Way SW.

Proposal

The subject property is proposing to expand the operation of their outpatient care facility to provide semi-independent housing. The project will include the construction of three buildings, two will support three housing units each (for a total of six units), and the third building will provide a commons building for facilitating social interactions. It is anticipated that 24 individuals will reside in the six units, with two staff members assigned to the commons building. The six (6) units will house outpatient care clients only. The total increase in gross floor area is approximately 10,857 square feet. The project also includes reconfiguration of surface parking lot and landscaping. The total quantity of existing parking stalls (249) will not change.

Public Comment:

Date of Notice of Application:	June 10, 2004
Date End of Comment Period:	June 23, 2004
# Letters	0
Issues:	No comment letters were received for this project.

ANALYSIS - SEPA

The initial disclosure of the potential impacts from this project was made in the environmental checklist submitted by the applicant (dated May 26, 2004) and annotated by the Land Use Planner. The information in the checklist, the supplemental information submitted by the applicant and the experience of the lead agency, with the review of similar projects form the basis for this analysis and decision.

The SEPA Overview Policy (SMC 25.05.665) clarifies the relationship between codes, policies and environmental review. Specific policies for each element of the environment, certain neighborhood plans, and other policies explicitly referenced may serve as the basis for exercising substantive SEPA authority.

The Overview Policy states, in part, “Where City regulations have been adopted to address an environmental impact, it shall be presumed that such regulations are adequate to achieve sufficient mitigation” subject to some limitations. Under such limitations/circumstances (SMC 25.05.665) mitigation can be considered.

Short-term Impacts

Construction activities could result in the following adverse impacts: construction dust and storm water runoff, erosion, emissions from construction machinery and vehicles, increased particulate levels, increased noise levels, occasional disruption of adjacent vehicular and pedestrian traffic, and a small increase in traffic and parking impacts due to construction workers’ vehicles. Existing City codes and ordinances applicable to the project such as: The Noise Ordinance, the Stormwater Grading and Drainage Control Code, the Street Use Ordinance, and the Building Code, would mitigate several construction-related impacts. Following is an analysis of the air, water quality, streets, parking, and construction-related noise impacts as well as mitigation.

The Street Use Ordinance includes regulations that mitigate dust, mud, and circulation. Temporary closure of sidewalks and/or traffic lane(s) would be adequately controlled with a street use permit through the Transportation Department, and no further SEPA conditioning would be needed.

Construction of the project is proposed to last for several months. Parking utilization along streets in the vicinity is moderate and the demand for parking by construction workers during construction is not anticipated to reduce the supply of parking in the vicinity. Parking demand for construction personal can be accommodated at the development site and any spillover can be managed within the SW Holden Street right-of-way. Therefore, no further mitigation will be required.

The development site is located adjacent to a residential area where construction of this scale is not anticipated to have a detrimental impact on noise levels. The SEPA Noise Policy (Section 25.05.675B SMC) lists mitigation measures for construction noise impacts. It is the department’s conclusion that limiting hours of construction beyond the requirements of the Noise Ordinance is not necessary to mitigate impacts that would result from the proposal on surrounding properties, because of existing City ordinances adequately mitigate such impacts. Therefore, no further mitigation is required.

Construction is expected to temporarily add particulates to the air and will result in a slight increase in auto-generated air contaminants from construction worker vehicles; however, this increase is not anticipated to be significant. Federal auto emission controls are the primary means of mitigating air quality impacts from motor vehicles as stated in the Air Quality Policy (Section 25.05.675 SMC). No unusual circumstances exist, which warrant additional mitigation, per the SEPA Overview Policy.

The proposed project is located within the Longfellow Creek drainage basin, which is a designated salmon watershed. The stormwater runoff from the project will drain to Longfellow Creek, an anadromous fish bearing Class A stream. Longfellow Creek provides habitat for aquatic species including coho salmon. The past three years Seattle Public Utilities, through their coho spawning surveys, have found that a large number of coho salmon that return to Seattle creeks die before they spawn (prespawning mortality). In Longfellow Creek, the prespawning mortality of coho has averaged 72% over the past three years. Pollutants in stormwater runoff are believed to be contributing to these prespawning deaths. Additionally, stormwater runoff to streams causes habitat degradation such as pool and bank scour during high flows. Construction related impacts can also impact the creek by introducing increased sedimentation to the creek, which leads to poor spawning habitat and the filling in of pool habitat. These potential impacts are both long and short term in nature. The specifics of each of these potential impacts are discussed below.

Pursuant to SMC 25.05.675C, additional mitigation beyond that already required by the Stormwater, Grading and Drainage Control Code, Chapter 22.800 of the Seattle Municipal Code, may be required if run-off from a proposed project could have adverse impacts and if the proposed project is located in an environmentally critical area or if the project drains into streams identified by the State Department of Fish and Wildlife as bearing anadromous fish. As mentioned above, this project lies within the Longfellow Creek Drainage basin and runoff from this site will drain into Longfellow Creek, an anadromous bearing stream.

Construction impacts include ground disturbance activity that can lead to soil erosion and the potential for this material to enter Longfellow Creek via stormwater runoff. And the potential release of pollutants including petroleum products from the construction equipment. Ground disturbance will lead to erosion of soils if not properly mitigated. Control of both the quantities and the quality of water leaving the proposal site during grading, construction and landscaping periods will be very important. The Seattle Stormwater, Grading and Drainage Control code provides for the implementation of extensive measures, or best management practices (“BMPs”) to mitigate these impacts. The Seattle SEPA Construction Impacts Policy provides conditioning authority is subject to the Overview Policy in that conditioning authority is authorized only when existing City codes or regulations are not adequate for one of several possible reasons (SMC 25.05.665). In this situation, the City Code, judiciously applied, is expected to result in adequate BMPs.

Long-term Impacts

Long-term or use-related impacts are also anticipated from the proposal: increased surface water runoff from greater site coverage by impervious surfaces; increased bulk and scale on the site; increased demand on public services and utilities; increased light and glare; loss of vegetation; and increased energy consumption. These long-term impacts are not considered significant because the impacts are minor in scope.

The long-term impacts are typical of institutional structures and will in part be mitigated by the City's adopted codes and/or ordinances. Specifically these are: Stormwater, Grading and Drainage Control Code (stormwater runoff from additional site coverage by impervious surface); Land Use Code (height; setbacks; parking); and the Seattle Energy Code (long-term energy consumption). Additional land use impacts which may result in the long-term are discussed below.

Height, Bulk, and Scale

Just across the 60 foot wide SW Webster Street right-of-way are single family uses. The design of each of the three buildings (containing a total of six units) is similar in proportion and materials to the surrounding residential area. Highline West Seattle Mental Health Center made a conscious effort to design buildings resembling structures commonly found within multifamily housing developments. The residential units are modeled after townhouse style projects with commons facility. The tallest structure will rise approximately 23 feet above grade (to top of ridge). The façades will feature the look of wood lap siding to provide additional features to evoke a residential presence along SW Webster Street. The distance between the closest building and the street property frontage (SW Webster Street) is twenty feet. Each of the buildings will have a pitched roof, double-hung windows with trim, and patios. These design elements reduces the appearance of institutional presence and will mitigate the height, bulk, and scale impacts of the structures. Therefore, no additional height, bulk, or scale SEPA mitigation is warranted pursuant to the SEPA height, bulk and scale policy.

Drainage

Currently the lot is developed with a parking lot and building. The proposal is to redevelop this area with three additional structures. This redevelopment includes the replacement of more than 5,000 square feet of impervious surface. The runoff from this site will go to Longfellow Creek. Activities on the site such as automobile use and pesticide use leads to pollutants entering Longfellow Creek. Long-term impacts are anticipated as a result of approval of this proposal including: surface water runoff from the site. Additionally, pollutants entering Longfellow Creek via stormwater will result from the development of the site if not mitigated. Pollutants degrade the water quality of Longfellow Creek,

Longfellow Creek provides habitat for aquatic species including coho salmon. The past three years Seattle Public Utilities through their coho spawning surveys have found that a large number of coho salmon that return to Seattle creeks die before they spawn (prespawning mortality). In Longfellow Creek the prespawning mortality of coho has averaged 72% over the past three years. Stormwater runoff is believed to be contributing to these prespawning deaths.

The Seattle Stormwater, Grading and Drainage Control Code is an adopted code that provides mitigation for the above impacts per 22.802.016 B 5 because the project qualifies as a large project and is within ¼ mile from Longfellow Creek. Section 22.802.016 B 5 states in part "...impacts to off-site water quality resulting from the project are to be analyzed and mitigated. The analysis shall comply with this section and rules promulgated pursuant to this Section. The analysis shall provide for mitigation of all surface water quality or sediment quality impacts. The analysis shall evaluate the impacts likely to occur ¼ mile downstream from the project. The impacts to be evaluated and mitigated shall include at least the following:

- a. Amount of sedimentation;
- b. Streambank erosion;

- c. Discharges to groundwater contributing to recharge zones;
- d. Violations of state or federal surface water, groundwater, or sediment quality standards; and
- e. Spills and other accidental illicit discharges;”

The Seattle SEPA Specific environmental policies drainage section provides conditioning authority but is subject to the Overview Policy in that conditioning authority is authorized only when existing City codes or regulations are not adequate for one of several possible reasons (SMC 25.05.665). In this situation, the Seattle Stormwater, Grading and Drainage Control Code, judiciously applied, is expected to result in adequate mitigation. Specific non-appealable conditions that will mitigate the impacts are listed at the end of this decision.

CONCLUSION - SEPA

In conclusion, several adverse effects on the environment are anticipated resulting from the proposal, which are non-significant. The conditions imposed below are intended to mitigate specific impacts identified in the foregoing analysis, or to control impacts not regulated by codes or ordinances, per adopted City policies.

DECISION - SEPA

This decision was made after review by the responsible official on behalf of DPD as the lead agency of the completed environmental checklist and other information on file with the responsible department. This constitutes the Threshold Determination and form. The intent of this declaration is to satisfy the requirement of the State Environmental Policy Act (RCW 43.21.C), including the requirement to inform the public of agency decisions pursuant to SEPA.

- [X] Determination of Non-Significance. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030(2)(C).
- [] Determination of Significance. This proposal has or may have a significant adverse impact upon the environment with respect to transportation, circulation, and parking. An EIS limited in scope to this specific area of the environment was therefore required under RCW 43.21C.030(2)(C).

SEPA CONDITIONS

The owner(s) and/or responsible party(s) shall:

Prior to the issuance of a Construction Permit

Pursuant to SMC 22.800 the following conditions shall be imposed:

1. Provide a water quality assessment analysis with mitigation measures that includes impacts to off-site water quality resulting from the proposed project. The analysis shall comply with section 22.802.016 B 5 and shall provide for mitigation of all surface water quality or sediment quality impacts. The analysis shall evaluate the impacts likely to occur ¼ mile downstream from the project. The impacts to be evaluated and mitigated shall include at least the following:
 - a. Amount of sedimentation;

- b. Streambank erosion;
 - c. Discharges to groundwater contributing to recharge zones;
 - d. Violations of state or federal surface water, groundwater, or sediment quality standards; and
 - e. Spills and other accidental illicit discharges;”
2. Volume 2 (*Construction Stormwater Control Technical Requirements Manual*) of SMC Title 22.800 Stormwater, Grading and Drainage Control Code shall be followed to minimize construction impacts.

Pursuant to SEPA policy 25.05.675 C2c the following conditions will be imposed.

3. An updated landscape plan shall be provided indicating the replanting of the maximum area with native vegetation.

Compliance with all conditions must be verified and approved by the Land Use Planner, Bradley Wilburn, ph.: 206-615-0508, at the specified development stage, as required by the Director’s decision. The applicant/responsible party are responsible for providing the Land Use Planner with the appropriate documents at the construction intake appointment. The Land Use Planner shall determine whether the condition requires submission of additional documentation or field verification to assure that compliance has been achieved.

Signature: (signature on file) Date: January 10, 2005
Bradley Wilburn, Land Use Planner
Department of Planning and Development
Land Use Services